

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SUSAN A. YOUNG,

Civ. Act. No.: 09-CV-9811 (RJH)

Plaintiff,

-against-

**DECLARATION OF
BARBARA S. CAMPBELL**

HARTFORD LIFE AND ACCIDENT
INSURANCE COMPANY and CONTINENTAL
CASUALTY COMPANY,

DOCUMENT
ELECTRONICALLY FILED

Defendants.

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BARBARA S. CAMPBELL, pursuant to 28 U.S.C. §1746(2) declares under penalty of perjury the following:

1. I am currently employed as the Regional Vice President for Hartford Life And Accident Insurance Company's ("Hartford") Maitland Claim Office. In August 2007, I was the was Assistant Vice President & Director, Clinical Practices for Hartford.

2. I submit this Declaration in opposition to Plaintiff's motion for summary judgment.

3. I am informed that Plaintiff asserts that after Hartford's audit performed in or around August 2007 of Reliable Review Services' ("RRS") panel of reviewing physicians, I requested that Leonid Topper, M.D. be removed from Hartford's panel of medical peer reviewing physicians because his primary area of practice was pediatric neurology and therefore, he was not competent to review adult neurology cases. I was the person responsible for the decision to remove Dr. Topper from the RRS panel for Hartford's medical record consultant reviews and I make this Declaration based on my personal knowledge. Plaintiff's assertion is incorrect.

4. In August 2007, I specifically requested that RRS remove Dr. Topper from its panel of reviewing doctors for Hartford because his clinical practice was primarily devoted to pediatric neurology. This decision, however, was not based on Dr. Topper's qualifications but rather, was

made to avoid anticipated collateral attacks from claimants in an attempt to distract from the substance of Dr. Topper's review with irrelevant arguments based on this perceived lack of qualification based solely on his clinical practice in pediatric neurology.

5. Dr. Topper is board certified in neurology and maintains a special qualification in pediatric neurology. Dr. Topper has competently performed reviews for Hartford since August 2007 through present on behalf of MES Solutions, Inc. ("MES") and he remains a medical record peer review consultant on MES's panel of doctors to perform reviews for Hartford requiring medical judgment in the field of neurology.

I declare under penalty of perjury that the foregoing
is true and correct.

Dated: February 23, 2011


BARBARA S. CAMPBELL

CERTIFICATE OF SERVICE

I, JOHN T. SEYBERT, hereby certify and affirm that a true and correct copy of the attached **DECLARATION OF BARBARA S. CAMPBELL** was served via ECF on this 25th day of February 2011, upon the following:

Scott M. Riemer Esq.
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s/_____
JOHN T. SEYBERT (JS 5014)

Dated: New York, New York
February 25, 2011